



## Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact [support@jstor.org](mailto:support@jstor.org).

when neither the state nor its citizens would suffer any inconvenience from the application of the foreign law." 2 Kent, 406. *Simmenlink v. Supreme Court I. O. F.*, 130 New York Supplement, 803.

---

**Judge Terrorizes Attorneys.**—Because the trial court, on the returning of the jury for the second time for instructions, said to the respective counsel that he desired no further requests in the presence of the jury, counsel made none, and took no exception to the court's statement. They now claim that the court's statement so overawed them—put them in such *terrorem*—that they abandoned their legal rights, and for the aforesaid conduct of the judge appellant would have the judgment reversed. The Supreme Court, Appellate Division, of New York, in *Bender v. Bahr Trucking Co.*, 129 New York Supplement, 737, holds that the record presents no such picture, and that it cannot believe that such was the result; that if counsel felt aggrieved by the court's statement, an exception should have been noted. "Neither," says the court, "could stand by and speculate for a reversal of an adverse judgment."

---

**Christian Science and the Courts.**—Owing to the prevalence of the Christian Science belief, which as popularly understood, dispenses with medical services in the event of illness, the following case from the Criminal Court of Appeals of Oklahoma, entitled *Owens v. State*, 116 Pacific Reporter, 345, commands interest as it seems to be quite clear cut in its terms. A child was taken seriously ill with typhoid fever, but owing to the religious belief of its father he refused to allow it medical aid though it was repeatedly offered free of expense. It appears that the father was thoroughly apprised of both the serious condition of his child and of the fact that he was rendering himself liable to a criminal prosecution, as the evidence shows that the county health officer so advised him. The child lingered and died. "Religious belief" was the defense interposed in the prosecution that followed under the Oklahoma statute, which provides that it shall be a misdemeanor for a parent to refuse his child medical attendance. The trial judge thereupon instructed the jury that such was not a defense, and the appellate court affirmed the conviction, saying that "full and free enjoyment of religious profession and worship is guaranteed, but acts which are not worship are not," and that a party's religious belief cannot be accepted as a justification for his committing an overt act, made criminal by the law of the land.